A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
76	241	2 -1	Section 2.1	Finfrock, DWR	Again, too many buzzwords. There are solution strategies, solution alternatives, conflict resolution strategies, alternate approaches, edge alternatives, and preliminary alternatives. Too hard to keep them straight. In general, too much detail in this section.	C	
77	242	2 - 1	Chap 2, Alternative descriptions	J Turner, DWR	Although the matrix showing the alternatives helps clarify the text in chapter 2, the text is confusing. For example, one alternative is described, then the next configuration is that alternative plus components, minus other components, with changes to ecosystem restoration actions. This is too confusing for a public document. At a minimum each configuration described and shown in the matrix should be accompanied by a figure showing the areas involved.	P	
101	243	2-12	Water Storage and Conveyance	George Barnes, DWR	While model studies to date were used to study only storage up to 3 MAF, we may not want to limit the draft EIR to upstream storage of 3 MAF at this point.	T	
1161	244	2.7	Table 2.2.1-1	FWS	The Table indicates that the requirements of section b(2) of the CVPIA are met in the No Action Alternative. We recommend that the modeling for No Action incorporate the 11/20/97 b(2) actions (we can provide a copy if needed) for fishery restoration. The modeling tools CALFED is using are capable of simulating all of these actions. There are several significant actions in the 11/20/97 packagae that are apparently not now included in the No Action Alternative.		
1162	245	2.7	Table 2.2.1-1	FWS	Although the "Physical, Regulatory, and Operational Features of the No Action Alternative are described in more detail in the Technical Appendix, relatively few people are likely to read the TA; it would be useful to have additional explanation of the items in the Table in the main document. It would be especially useful if the various environmental restoration efforts identified in the Table were described; it's likely that other readers would like to see other line items fully described as well.		
86	246	2-1		K. Kelly, DWR	section 1.4 is referenced incorrectly. It should be 1.3.	C	
19	247	2-1		EPA	results need to be highlighted instead of so much discussion on process		
25	248	2-1		CDFA	how does this alternative process relate to CEQA regs calling for range of reasonable alts?		
609	249	2-1	chapter 2	Rick B., CALFED	Overview - section 2.3 will go first; a sizable amount of 2.1.1 will be deleted; 2.2.5 will be deleted; information from 1.5.3 will be added; 2.7 will be moved before 2.4; 2.5 will go to chapter 4; 2.6 will go to chapter 5		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
79	250	2-1	section 2.1	jw, DWR	The four primary objectives are repeated and defined 3 more times!	C	
690	251	2-1 to 2-5	Section 2.1	WAPA	In Section 2.1, the discussion of the six-step process for the development of alternatives leaves the reader with the impression that the task was very difficult – to the extent that the reader has no understanding of the process. For example, what is the substance of the 16 alternative approaches and 32 "*edge*" alternatives? If these are discussed in Phase I, then reference Phase I (more frequently than at the beginning of the section). We strongly suggest the six-step process include a diagram of the process.		
792	252	2-1	Para. 3	CHoward,USBOR	Reference to Section 1.4 should be 1.32		
610	253	2-1 to 2-4	2.1 to 2.1.1.5	Rick B., CALFED	delete everything after the first paragraph of 2.1.1. through 2.1.1.5.		
1023	254	2-1	2.1.1	BK, EPA	consider x-ref to 2.3 and/or Table 11.4-1 and/or use in executive summary		
78	255	2-1	2.1.1.1, 2nd para	Finfrock, DWR	This is an excellent overview of the 4 CALFED components and might be helpful earlier in the document, like 1.1.2 or 1.2.	C	
791	256	2-1	2.2.1, first paragraph	Choward, USBOR	Stating clear identification of the problems, goals, and objectives of the "levee system integrity program," instead of the "Bay Delta System Vulnerability" would be helpful.		
100	257	2-10	section 2.2.3.4	K. Kelly, DWR	The Delta levee subsidence control plan implies something much bigger than it warrants. I think this effort is still in the research stage. Also, this discussion references adaptive management loosely (see comment on Chapter 1).	C	
695	258	2-10 to 2-12	Sections 2.2.3.5 and 2.2.3.6	WAPA	It is unclear how the discussion of Water Transfers and Watershed Management Coordination fits into the structure of the alternatives. Figure 2.2.2-1 does a great job of illustrating all the other structural elements in Section 2.2.3, but the figure does not show how Water Transfers and Watershed Management Coordination fit into the CALFED Program. Will these actions remain unchanged throughout the alternatives? These are cross cutting elements (as noted in Section 2.2.4) and perhaps should be discussed up front or at the end of the section.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
122	259	2-10	line 3	Ed Craddock DWR	The agricultural water use efficiency element needs more information. It should mention the sections of the water code identifying EWMPs as the practices targeted for DWR assistance programs, the formation of the Agricultural Water Management Council and the CVPIA agricultural conservation program.	T	
123	260	2-10	line 12	EC, DWR	The urban water use efficiency element needs more information. It should mention the Urban Water Conservation Council and the BMPs, the sections of the Water Code relating to urban water management planning and the CVPIA urban water conservation program.	T	
1167	261	2-10	col. 1, last bullet	FWS	As a general policy, water recycling should be widely encouraged, but CALFED incentives for water recycling should be made more readily available to areas determined to have already achieved high levels of water use efficiency.		
32	262	2-10	2.2.3.3	Steve Shaffer, CDFA	WUE Should state that to receive CALFED benefits, one must participate in the CALFED WUE program.		
802	263	2-10	2.2.3.4, bullet one	Gore, USBOR	Public Law 84-99 does not have level of protection standards. Recommend clearly defining the "Base Level Protection Plan." It would also be helpful to clarify if the goal is to ensure that all of the levees in the Delta are built to a standard design criteria, thereby ensuring higher reliability, or to establish higher levees to protect against higher stages.		
22	264	2-10	2.2.3.4 1st bullet	BOR	don't indicate that level of protection is increased in all cases; but rather strives to increase stability and structural integrity		
996	265	2-10-11	2.2.3.3 and 2.2.3.5 (and elsewhere)	NY, EPA	Delete first sentence under both ag and urban: "recognizes a clear standard..." has no clear meaning. Instead, briefly describe general assurances and measures under each. Explain briefly what the "Water Transfer Program" is and be consistent in classing it within, or separate from, the WUE Program. Add information on the data collection/clearinghouse ideas. (Current text on transfers is inadequate.)		
125	266	2-11		DWR O&M	The Watershed Management program and "watershed strategic plan" appears to be the same as the current "Basin Plans". How are they different?	C	
803	267	2-11	general	Slavin, USBOR	The entity who submits and approves the Watershed Strategies Plans. Do the Plans have any relationship to other plans should be identified. Also, how they will relate to other plans should be explained.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
124	268	2-11	Section 2.2.3.6	R. Tom, DWR	Although the Comprehensive Monitoring, Assessment, and Research Plan (CMARP) is listed as a part of the mitigation monitoring plan under Phase III (page 1-13), it should also be mentioned under the section entitled **Watershed Management Coordination** as a tool for CALFED to use when implementing projects and providing cost-effective approaches to individual watershed management activities.	T	
1068	269	2-11	Section 2.2.3.6	SZ, EPA	**Watershed Management Coordination:** The description of watershed management and the identified potential consequences will need to be adapted to accurately reflect the CALFED watershed management strategy as it is more fully developed. Between the Public Draft and Final EIS/EIR, we anticipate that watershed management and CALFED- associated activities will be revised to better define and develop the activities that will enhance watershed management consistent with CALFED goals. This may likely result in revisions to the environmental consequences identified in Table 3.1-1 (page 2) and that are described on page 6-115.		
23	270	2-12	bullet on south delta mods	DWR	review entire section to focus on south delta modifications and use language provided by DWR (Interim South Delta Program)- Sandino		
103	271	2-12	section 2.2.3.7 second paragraph.	K. Kelly, DWR	Delete "and on-stream". Third paragraph first sentence. add "in Phase III" after "evaluated". second column. See comment for page 2-8. Also the bullet descriptions under this category are so ambiguous I can't tell which one is the barriers.	C	
102	272	2-12	Section 2.2.3.7, 2nd Column, 1st full paragraph	Sandino, DWR	South Delta Modification bullet is an overstatement, which I believe should be modified.. ISDP is intended to result in the modification of DWR requirement to satisfy certain South Delta Water Quality objectives, but ISDP will not result in the "removal of current regulatory constraints." DWR only wants its water rights permits modified so it is not responsible for meeting South Delta Water Quality objectives. Also, ISDP will permit DWR to increase pumping *at times*, but the pumps will not be operating at full physical capacity at all times as a result of ISDP, which is the impression given by this statement.	T	
804	273	2-12	Section 2.2.3.7	Choward, USBOR	The process to develop the storage capacity should be discussed.		
9	274	2-12, to 23	Section 2.2.3.7	Robin Reynolds, CDFA	The determination of capacity ranges must be subjected to analysis in the forum of the EIR. These are discretionary decisions, which not only have a potential to impact the existing environment, but also the sizing and allocation of capacities could form the basis for feasible mitigation for certain project impacts.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
33	275	2-12	2.2.3.3	Steve Shaffer, CDFA	Water Storage and Conveyance - to evaluate a full range of storage options, the range of surface storage upstream of the Delta should be up to 13MAF.		
997	276	2-12	2.2.3.7	CY, EPA	Storage: State that additional studies will also help CALFED determine the need for storage.		
106	277	2-13		K. Kelly, DWR	First bullet: "The new screened diversion facility may also supply water for continued through-Delta conveyance." Is this right? Also the discussion of the conveyance components is confusing because of the use of the verbs "will" and "may". I think it would be easier to read if "would" and "could" were used. Second bullet. "For some of the smaller isolated conveyance capacities, a buried pipeline concept will be evaluated." Wasn't the pipeline eliminated? Also if it is to be evaluated, where will that be done? In Phase III or later in the document?	C	
127	278	2-13		DWR O&M	What would the priority schedule for implementing the various projects under each alternative.	T	
1122	279	2-13	Section 2.2.3.6	SZ, EPA	Watershed Management Coordination - see comment # 23 listed under EPA's Water Quality Comments.		
1025	280	2-13	Fig 2.2.4-1	BK, EPA	because all Program cells are =, move them to right of chart, so easier to associate Alts with differences among Storage & Conveyance cells		
104	281	2-13	section 2.2.4	K. Kelly, DWR	Second paragraph. I don't think it can be said that each alternative will fully implement a water transfer element. The ability to accommodate transfers is dependent upon conveyance capacity so each configuration will implement the water transfer at different levels. Does the ERP rely on regulatory mandates ever? If this exclusion is applied to all the alternatives, why are regulatory mandates included in the ERP? Recommend listing configurations that were eliminated or combined (2C, 3C, 3D, 3F, & 3G) with a short statement of explanation.	C	
129	282	2-13	Section 2.2.4	Mike Cooney, DWR	It should be stated in the introductory paragraph for this section that five configurations were not carried forward for further evaluation, but are discussed in Section 2.7. This could eliminate confusion regarding the missing configurations (i.e. configuration 2C).	C	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
128	283	2-13	Section 2.2.4	Spaar, DWR	It would be very helpful to include at least a map of the Delta area, if not figures describing each alternative. It is really difficult to visualize the alternatives, and in turn, be able to understand their impacts without referring to a map such as in the Sacramento-San Joaquin Delta Atlas (DWR 1993).	P	
515	284	2-13	Section 2.2.4	DFG	Consider including a map of each alternative, similar to those which can be found in the CALFED document *Phase II Alternative Descriptions*		
805	285	2-13	Section 2.2.4	Choward, USBOR	Alternative tables should show various configurations, such as in Alt. 1, configuration 1A, 1B, 1C. It would be helpful to have a matrix to review and compare each alternative and their configurations with other alternatives.		
105	286	2-13	Table 2.2.4-1	Sandino, DWR	I think it would be helpful to have a 2 page table covering all the alternatives similar to that used for Alternative 1 for the convenience of your reader. I would focus on the differences between the alternatives presented in table form.	P	
1024	287	2-13	Table 2.2.4-1	BK, EPA	consider adding Configuration reference to Table		
126	288	2-13	2.2.4	K. Nelson, DWR	The "Alternatives Matrix" would have been very helpful in reviewing the document. Also, would it be possible to provide a graphical illustration of each of the alternatives? Figures are often easier to comprehend and compare than lots of descriptive text.	P	
806	289	2-13	2.2.4	Gore, USBOR	It would be very helpful to develop a table which lists each component and then highlights the differences between the plan. The alternatives matrix described as being available in the pocket of the inside back cover was not available for review.		
807	290	2-13	2.2.4	Gore, USBOR	As a minimum the PEIS should include a more detailed description of the plan identified in the main body. A clear understanding of the alternatives is critical to verifying the adequacy of the impact analysis. Suggest including the comparison seriously considered now in the main body , and the work used to get us hear should be presented in the appendix.		
619	291	2-13	tab2.2.4-1	Rick B., CALFED	the table doesn't seem to fit. i'd like to see it follow 2.2.4 so it sits closer to 2.2.4.1. this comment applies to the other two tables as well.		
36	292	2-14			see DFG comment for bullet language		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
516	293	2-14	Ecosystem Restoration Program, Left Column, Bullet 2	DFG	Modify to read: "Habitat restoration of tidal emergent wetland and tidal perennial wetland identified for the south Delta would ..."		
1168	294	2-14 and other sections	Ecosystem Restoration Program, second bullet	FWS	The locations of habitat restoration actions need to be analyzed to determine how the alternative sites compare in terms of overall "value" for restoration of sensitive species, not just sensitive fisheries. Before a decision to relocate habitat restoration is made (e.g., moving habitat restoration from the south Delta to the north and west Delta), a number of issues ought to be considered, including species diversity of the sites, how abundances of sensitive species compare among sites, whether any of the sites contain populations of any species that may be especially distinct or otherwise "important" to the recovery of that species, and how habitat diversity varies among the sites. The need for and importance of such an analysis should be acknowledged in the document.		
131	295	2-14	2nd bullet and throughout Alternative descriptions	jw, DWR	Although it may be prudent to relocate restoration targeting fisheries away from the South Delta pumps, other restoration is needed in the area. Riparian and freshwater emergent marsh restoration would benefit many species including sensitive species such as: Swainson's hawks, pond turtles, Mason's lilaeopsis, Delta mudwort, California hibiscus.	T	
130	296	2-14 et.al.	line 25	EC, DWR	Not enough detail has been presented to determine what the entire WUE program is for any alternative.	C	
808	297	2-14,15	Column 2	Choward, USBOR	Under Water and Storage Conveyance. The terminology for configurations and other alternative should be consistent. Figure 2.2.2-1 uses **UP** to denote upstream storage both south and north of Delta, under conf. 1C it indicates "on Sacramento River," and 1.Mil south of Delta . Same comment on page 2-17. Suggest Figure 2.2.2-1 be modified consistent with paragraphs.		
132	298	2-15		Lehman, DWR	You need to say what these habitats provide - food availability, nursery habitat etc.	T	
107	299	2-15	Section 2.2.4.2, 1st Column	Sandino, DWR	I assume the 1C alternative includes all of the ISDP components already described in 1B (fish and salinity barriers). This is not clear from the text and should be clarified.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
108	300	2-15 to 2-22	Section 2.2.4.3	Sandino, DWR	**General Comment:** This is an important section because it introduces the alternatives. I think the presentation needs polish. The differences in the alternatives needs to be highlighted. They do not stand out as much as they should in my view.	JA	
1026	301	2-15	Table 2.2.4-2	BK, EPA	consider adding Configuration reference to Table		
809	302	2-15	2.2.4.2	Gore, USBOR	In configuration 2A reference is made that this plan includes Alternative 1 conveyance features. Since configurations 1B and 1C have different conveyance features, it is unclear which are included in this plan. All plan descriptions need to be clarified.		
133	303	2-15	2.2.4.2 , 2nd bullet	jw, DWR	Is this correct? The main feature west of the flow and stage control structures is Clifton Court Forebay. Should west be replaced by downstream or north? Also, see comment above about the value of restoration in the South Delta.	T	
134	304	2-15,etc.	Table 2.2.4-2 et.al.	EC, DWR	The final numbers generated for the WUE program need to be presented in these tables.	T	
517	305	2-16	Last paragraph of Section describing Alt. 2A	DFG	Delete 1B from the last line. Referencing 1C adequately describes the modification and improvements.		
109	306	2-16 to 2-17	Section 2.2.4.2	Sandino, DWR	Alternative 2B states that it is like 2A except it modifies the ERP and storage component. The difference between the ERP is not clear to me. Both alternatives look the same except for the possibility of environmental water use. If that is the difference, I suggest stating that clearly	C	
135	307	2-16	2nd col, 4th bullet	jw, DWR	It seems that any remnant existing levee would be in the channel, how will it be determined if it obstructs the channel? In other words how many remnant levees will actually be converted to channel islands?	T	
518	308	2-17	Right Column, Paragraph 1, Line 2	DFG	Clarify that it is referring to alternative 1C. (This change is also relevant to other sections in this chapter e.g. page 2-20 and 2-21)		
519	309	2-19	Right Column, Paragraph 2; Line 8	DFG	Clarify that it is referring to Alternative 1C		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1027	310	2-19	Table 2.2.4-3	BK, EPA	consider adding Configuration reference to Table		
512	311	2-2	Right Column, Paragraph 1, Last Line	DFG	Add at end of sentence: "...because they help define the boundaries around the alternatives".		
80	312	2-2	2.1.1.5, 2nd para	Finfrock, DWR	This section is confusing. The first sentence, with its alternatives, strategies, objectives, and themes is really dense. The last two sentences are quite clear, and could be changed slightly to stand alone without the first two sentences.	C	
37	313	2-20	final bullet, 1st column		is it necessary to call out mitigation lands? Or can we remove parens language		
520	314	2-20	Left Column, Last Bullet	DFG	Delete language inside parentheses referring to mitigation.		
110	315	2-20	Section 2.2..4.3	Sandino, DWR	The Dual Delta Alternatives jumps from 3b to 3h. What happened to 3c to 3f? I assume they were eliminated and this will be explained later, but it would help to clarify this point now.	C	
810	316	2-20	Column 2	Choward, USBOR	Configuration 3E, why no 3C, 3D? 3F, if screened out mention in Intro to Alt 3 on page 2-19. To avoid confusion, 3c,3d,3f exclusion should be explained.		
521	317	2-21	Left Column, Paragraph 3	DFG	It isn't clear how the pumping capacity is increased by virtue of the new intake to Clifton Court or the head of Old River barrier since this alternative does not include Old River dredging.		
111	318	2-21	Section 2.2.4.3	Sandino, DWR	The difference between Configuration 3h and 3b is not clear.	C	
38	319	2-21	two first bullets		review accuracy of two bullets describing configuration 3E		
811	320	2-23	Column 1	Choward, USBOR	Suggest that Water Storage and Conveyance heading be changed to Water Conveyance. Alternative would be to move last sentence in Column 2, paragraph 1 on page 2-22 to this write up. Similar editing for 3H.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
136	321	2-23	Line 5	Spaar, DWR	Water Storage and Conveyance - The description in the 1st paragraph does not parallel the description of the 4 intakes that follows. Three isolated conveyance channels are indicated, followed by a description of each with a 4th intake (Hood) stuck in the middle of the bulleted descriptions. This makes it difficult to follow the alternative description. Suggest indicating in the 1st paragraph that the Hood intake is a 4th intake, and move it from the 3rd intake described (2nd column, top 2-23) to the 4th..	C	
620	322	2-23	2.2.5	Rick B., CALFED	delete this section		
112	323	2-25		K. Kelly, DWR	How about maps of the problem and solution areas?	P	
39	324	2-25	last sentence, right col	DFG	remove phrase 'or ecological preferable'		
522	325	2-25	Right Column, Last Paragraph, Last Sentence	DFG	Delete the phrase "or ecologically preferable". Clearly it is not ecologically preferable to only address one of the problem areas for salmon restoration.		
1124	326	2-25	Section 2.3.1, 3rd paragraph	GL, EPA	The description of the solution scope (described in the third paragraph) is not consistent with the description in the purpose and need statement approved by the Management Team. The last sentence should be rewritten to read "Thus, although each action will not affect the entire geographical solution area, certain actions will directly or indirectly affect areas within the Central Valley watershed, the Southern California water system service area, Suisun Bay, San Pablo Bay, San Francisco Bay, and portions of the Pacific Ocean out to the Farallon Islands and a near-coastal band extending from about Morro Bay to the Oregon border."	**	
10	327	2-25	Section 2.3.1, last paragraph on page	Robin Reynolds, CDFA	The Lead Agency should justify why elimination of the commercial and sport take of these species, and control of predation, are not even considered. It is not rational to continue to allow take of endangered species for profit and pleasure, and not even consider control of exotic predators, while at the same time proposing draconian measures with huge costs, uncertain benefits, and very significant adverse impacts on the existing environment to enhance these same populations.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
621	328	2-25	2.3	Rick B., CALFED	move this whole section to the beginning of this chapter. 1st paragraph of 2.3 - delete except for "The appropriate...the Program" in the first two lines. This first sentence then continues in 1st sentence of 2nd paragraph but, delete "The approach which" and insert "that". Delete last sentence of this paragraph "The specifics... presented below"		
622	329	2-25 to 2-27	2.3.1 and 2.3.2	Rick B., CALFED	2.3.1 moves unchanged. 2.3.2 - delete figure number for study area map. Just tell them where it will be. Delete 1st two paragraphs "Upper Watersheds".		
1125	330	2-26	Section 2.3.2, Bay Region	GL, EPA	Second sentence under Bay Region is very awkwardly written. Suggested rewrite: "In addition, an offshore band approximately 25 miles wide, running from Point Conception to the Oregon border has been included..."		
1126	331	2-26	Section 2.3.2, San Joaquin River Region	GL, EPA	I thought there was discussion about not including Tulare Lake basin within CALFED's solution scope (wasn't that the original intent of the now-defunct San Joaquin River issue paper?). Is there a compelling reason to including Tulare within the scope? Under what circumstances do conditions in the Tulare Basin relate to CALFED Program water quality problems and goals?	**	
1028	332	2-26	Fig 2.3.2-1	BK, EPA	if use 8 ½ x 11 map, need larger/clearer image, and x-ref to more detailed inset maps of Bay and Delta Regions maps		
139	333	2-26	Figure 2.3.2-1	Finfrock, DWR	Poor quality map; study areas not clearly delineated.	P	
137	334	2-26	Sec 2.3.2	Stuart, DWR	The region name, "SWP and CVP Service Area Outside the Central Valley", is not very descriptive of the area intended, considering Imperial County is included and the Santa Clara Valley Water District (Bay Area) is not. I am disadvantaged because I do not have the referenced figure.	C	
696	335	2-26	Section 2.3.2 and Figure 2.3.2-1	WAPA	Figure 2.3.2-1 identifies "*Outer*" Bay but this region is not specifically discussed in Section 2.3.2, or in the discussions of regions in Chapters 6, 7, and 8. If this is the "*zone of approximately 25 miles offshore*", then identify it as the "*Outer*" Bay in the discussion of the Bay Region.		
33	336	2-26	2.3.2		Tulare Basin discussion - is this appropriate to be included? Misleading - remove second sentence, para only consists of first sentence.		
138	337	2-26	2.3.2 (Bay)	C. Enright, DWR	Suisun Bay and Marsh should be included as a separate "effected region" given its unique brackish water ecosystem.	T	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
766	338	2-27	first paragraph	Judy Heath, CALFED	The CALFED Coordinated Watershed Management Program includes both upper and lower watershed areas. Coordination activities will include the Delta, Bay or CVP-SWP Service Areas. There may not be watershed projects in all these areas, but coordination activities will be needed to ensure no misdirected impacts and to ensure an integrated regional approach. Therefore, a geographic area description of the Delta, Bay and CVP-SWP Service areas should be included under watershed management to avoid any misconceptions. This is in conformance with the CALFED Coordinated Watershed Management Strategy in the technical appendix.		
1509	339	2-27	Last para	SWRCB	The first sentence of the paragraph states that "[I]n response to the Bay-Delta Accord, SWRCB is evaluating alternatives to D-1485 and the Bay-Delta Plan Accord to meet water rights and water quality issues in the Delta." The SWRCB is not a signatory to the Bay-Delta Accord, only to the Framework Agreement. The principal purpose of the SWRCB's water right process is to implement the objectives in the 1995 Bay-Delta Plan.		
40	340	2-27	lastpara right col		replace first sentence as indicated by DFG comments		
523	341	2-27	Right Column, Last Paragraph, Last Sentence	DFG	Delete current first sentence and replace with, "As a follow-up to adopting the 1995 Water Quality Control Plan in 1995, the SWRCB is evaluating alternatives for implementing that Plan."		
24	342	2-27	second column	DWR	ck water rights process language with SWRCB		
1127	343	2-27	Section 2.3.2, Upper Watersheds	GL, EPA	In the first sentence on top of page 2-27, I believe the second "Sacramento" should be "San Joaquin".		
142	344	2-27	"Water Rights Process...", line 3	Steve Hayes, DWR	Consider using the term "water right" rather than "water rights" when discussing the water right concept as a whole, or when discussing a singular item (as shown in Comment 6)). For example, phrase "...to meet water rights and water quality issues" can be modified to read "...to meet water right and water quality issues..."	C	
140	345	2-27	Line 2	Spaar, DWR	Correction - Watershed Management Coordination will occur in the Sacramento River and San Joaquin ~~Sacramento~~ River Regions, which are described below.	C	
141	346	2-27	Sec 2.4	Stuart, DWR	The Colorado River Board/DNK 4.4maf California Plan or the currently planned IID-SDCWA water transfer is not included. These will have an impact on the demand for northern California water.	T	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
113	347	2-27	Section 2.4, 2nd column, last paragraph.	Sandino, DWR	The water rights process discussion needs to be rewritten. There are several statements that need clarification. The SWRCB is not evaluating alternatives to D-1485 and the Accord per se. It is actually evaluating alternatives to implement the 1995 Bay-Delta Water Quality Plan. The alternatives include ones that may make water rights holders besides the SWP and CVP responsible to meet water quality objectives. Delta export criteria are not being changed, because that was part of the 1995 plan itself. I also question the conclusion that the SWRCB process will provide much water to the ERP, because at the end of the SWRCB process, the water quality objectives influencing the environment will still be satisfied albeit perhaps with a slightly different mix of responsibility. All SWRCB flow alternatives still make the SWP and CVP ultimately responsible to meet the contributions and the flow contribution by the other parties for all the alternatives is small in comparison.	C	
697	348	2-27 to 2-29	Section 2.4	WAPA	The relationship between CALFED and other ongoing programs is an important discussion for understanding how these other programs could potentially impact the alternatives as they are outlined in this PEIR/EIS. This was well done in the discussion of Bulletin 160. State the relationship between CALFED and other ongoing programs directly in terms of how elements of these other programs were incorporated in the No Action and other alternatives.		
623	349	2-27	2.3.2	Rick B., CALFED	2nd paragraph left column - move so it is discussed immediately following Sacramento River Region on page 2-26. Delete 3rd paragraph. Move 4th paragraph immediately following the San Joaquin River Region discussion on page 2-26. delete last paragraph this section.		
624	350	2-27	2.4	Rick B., CALFED	insert 1.5.3 before 2.4.		
625	351	2-27	2.7	Rick B., CALFED	insert after 1.5.3 and before 2.4.		
999	352	2-28		CY, EPA	Discuss the Category III/Ecosystem restoration funding process and near-term actions.		
524	353	2-28	CVPIA Section	DFG	Consideration should be given to updating this section to reflect recent plan for B2 water (800,000 AF).		
998	354	2-28	CVPIA	TH, EPA	Correction: "Friant" Division Surcharge Delete sentence ending last para 1st col: "Improving reliability..."		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
813	355	2-28	Trinity River Studies...last sentence	Fujitani, USBOR	Suggest revise to..."and a corresponding change in the amount diverted to the Sacramento River system could affect future flows to the Delta and overall water supply reliability."		
698	356	2-28	Col. 2, par. 2, Trinity River, last line	WAPA	Add to end of paragraph, "as well as carryover storage in Shasta Reservoir and water quality and temperature in the Sacramento River."		
114	357	2-28	2nd column, 1st paragraph	Sandino, DWR	minor point: I would clarify that the SWRCB is considering expanding the CVP place of use during its water quality plan implementation process.	C	
1510	358	2-28	2nd para	SWRCB	The text claims that the 800,000 acre-feet fish and wildlife dedication of the CVPIA is included in the no action alternative. This statement gives the impression that the modeling includes the dedication. On page 6-27, the text states that the CVPIA flow targets are not included in the modeling.		
812	359	2-28	2.4, Water Rights Process for CVP...	Fujitani, USBOR	To balance the statement that additional in stream flows in the future could assist in meeting goals of the ERP, it should also be noted that this additional demand on the water rights holders could decrease the water available for transfer.		
34	360	2-28	2.4	Steve Shaffer, CDFA	CVPIA, BoR - Improving reliability of supply is not mitigation for the reallocation of 800 TAF from ag to the environment. Delete the paragraph at the bottom of the first column on this page.		
1001	361	2-29		TH, EPA	VAMP has not been done yet: refer to proposed Plan. Second VAMP paragraph: edit--- "Water will be acquired from willing sellers by the USBR and DWR on the San Joaquin River and its tributaries." Omit the rest of the paragraph.		
115	362	2-29	first paragraph	K. Kelly, DWR	on VAMP Change "State Board's fishery objectives" to "State Board's flow objectives".	C	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1128	363	2-29	Section 2.4, Long-Term Dredged Disposal Study	BR/GL, EPA	Suggested rewrite and retitling of this section below: Long-Term Management Strategy (LTMS) U.S. EPA/Corps of Engineers/SWRCB, RWQCB, BCDC Coastal managers have long expressed concern about environmental threats of disposing large volumes of sediments in ecologically sensitive areas. The LTMS's long range goals are to reduce disposal in the Estuary and to instead find beneficial uses for the dredged material. The Strategy has already resulted in designation of a deep ocean disposal site 50 miles offshore of San Francisco that is an ecologically superior alternative to disposal in the Estuary itself. Since use of the ocean disposal site began in late 1995, over 4 million cubic yards of dredged material have been diverted from disposal in the Bay, and overall Bay disposal has dropped from historic averages of about 6 million cubic yards annually, to approximately 21/2 million cubic yards.		
					However, this is the short-term approach until beneficial use projects can be initiated. Dredged material can be reused in a variety of ways, including levee maintenance and stabilization, or restoration of habitat such as tidal wetlands. Using clean sediments from dredging projects, the LTMS agencies have participated in pilot levee maintenance projects and have constructed the Sonoma Baylands wetland restoration project. LTMS is now considering other projects, and other ways of beneficially reusing dredged material. A specific policy of the LTMS is to pursue habitat restoration projects that are consistent with habitat goals and plans worked out in other venues, including CALFED. Of particular interest are the cost-sharing opportunities working with the Corps of Engineers and other dredgers who must pay for the dredging in any event. These parties are in a position to provide the clean material to restoration projects much more efficiently than if the restoration project were to aquire the material on its own. CALFED and LTMS will coordinate during CALFED Program Implementation on potential joint levee construction and habitat restoration projects.		
1169	364	2-29	2nd column, 2nd paragraph:	FWS	The paragraph discusses VAMP and the use of a pulse flow at Vernalis to meet anadromous fish objectives. The March 5, 1995, delta smelt biological opinion on CVP/SWP operations included a Vernalis pulse flow to move delta smelt juveniles and larvae to Suisun Bay. Include a statement that VAMP flows should have beneficial effects for delta smelt.		
1511	365	2-29	2nd col, 1st para	SWRCB	As of this date the VAMP has not been signed. The text implies that the deal has been completed.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1159	366	2-3	Table 2.1.1-1 Row 1, Sub-objectives, second phrase	FWS	Change to read "so they can support sustainable production and survival of plant and wildlife species".		
146	367	2-30		DWR O&M	The "IDT" process is not explained?	C	
145	368	2-30	Section 2.5.2	R. Tom, DWR	Other than in the list of acronyms (page xiii), this is the first part of the draft document in which the acronym IDT is used. The acronym IDT should be defined in this section.	C	
116	369	2-30	section 2.5.1	K. Kelly, DWR	When this portion is full developed, please use the phrase "storage and conveyance configuration" instead of "alternative configuration" because it is more specific and helps to emphasize that the alternatives consist of common programs, storage, conveyance plus components on assurances, financing, and watershed management.	C	
144	370	2-30	Section 2.5	Finfrock, DWR	This is not very informative to someone not involved in the process. Note here what IDT is.	C	
1170	371	2-30 to 2-31	Section 2.5	FWS	While this section will probably be redrafted prior to public release, based upon the notes inserted here, it seems somewhat biased towards maximizing storage (Sec. 2.5.2, second paragraph, IDT Process) and building up the benefits of Alternative 3 vs the others (p. 2-31, "Alternative with technical and.." and the section titled "Etc.??"). This section, when written, should be reviewed to ensure that proper balance is provided. Emphasize the benefits of additional storage and the pros/cons of surface vs. groundwater vs. in-Delta, not "why we need additional storage". The section titled Etc.?? appears to be unnecessary, since each IDT alternative should show performance advantages, disadvantages, and associated concerns. Also, note that the IDT did *not* conclude that "we *need* storage with all alternatives"; at most, the IDT narrowed the range of storage being considered, but only at the upper end. All IDT alternatives included the possibility of no new storage.		
699	372	2-30	Col. 1, bottom	WAPA	Replace "Etc." with specifics, including discussion on hydropower issues.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1000	373	2-30	2.2.5	All, EPA	This summary will need to be wholly rewritten. **We presume that text in the PEIS will derive from a Phase II document acceptable to all agencies.** 1. This text gives the impression that the DEIS and Phase II document will, at this time, present the TRMA. This would be unacceptable to EPA. 2. IDT work cannot be characterized as having made any conclusion regarding need for storage. Need for storage has not been demonstrated. The DEIS and/or Phase II document should identify any additional analyses planned to address need for storage. 3. Note that the bromides chart page 2-31 is not consistent with summary of impacts in water quality section of EIS. If chart is accurate, this would have to be clarified (e.g., further optimization of certain alternatives). Generally, be prepared to explain the relationship of impact analyses in DEIS to specific work done for modified alternatives (IDT).	**	
626	374	2-30	2.5	Rick B., CALFED	this whole section except 2.5.3 is deleted. 2.5.3 is left to direct reader to chapter 4.		
143	375	2-30	2.5.2	K. Nelson, DWR	What is IDT?	C	
147	376	2-31	Section 2.6	EC, DWR	There is important legislation on urban BMPs and agricultural EWMPs that should be summarized in this section.	T	
700	377	2-31 to 2-39	Section 2.6	WAPA	The Clean Air Act and relevant State air quality regulations should be considered in this section. This section considers "*existing laws and regulations affect the existing environment in the Delta, and must be considered in assessing the potential for future actions.*"		
1129	378	2-31	Section 2.6	SZ, EPA	Insert discussion on Nonpoint Source Program under "Institutional and Regulatory Framework" discussion. (See comment #24 under EPA Water quality Comments.)		
627	379	2-31	2.6	Rick B., CALFED	move this section to chapter 5. will be the new 5.4. delete 1st sentence of 2.6. change "the Delta" to "California" in 2nd sentence.		
1002	380	2-31	2.6.1	TH, EPA	replace the first paragraph with: "The following statutes and regulations are designed to protect environmental, agricultural, municipal, industrial and recreation uses of water."		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1513	381	2-32	#2.6.1.2, last sentence in 1st para	SWRCB	The SWRCB does not routinely implement water quality objectives through water rights, and probably has never issued water right permits for this purpose. In acting upon water right applications, the SWRCB considers water quality control plans and may establish terms and conditions in the permit to carry out such plans. It also can put conditions on existing water rights to achieve water quality objectives.		
1516	382	2-32 & 2-33	#2.6.1.3	SWRCB	D-1485 and the 1978 Delta Plan were meant to protect the beneficial uses in the Delta as they would exist in the absence of CVP and SWP operations, not before these operations.		
148	383	2-32	2.6.1.3, lines 4-5	Steve Hayes, DWR	Should be Water Right Decision 1485 rather than water-rights decision 1485	T	
1512	384	2-32	#2.6.1.2, 1st para	SWRCB	The discussion on the Porter-Cologne Act could be improved. (1) All water quality control plans are not basin plans. The Regional Boards adopt basin plans exclusively. The SWRCB can adopt basin plans or statewide plans. (2) According to Section 13050 of the California Water Code, basin plans consist of a designation for the waters within a specified area of beneficial uses to be protected, water quality objectives to protect those uses, and a program of implementation for achieving the objectives. The program of implementation can include many actions beyond issuance of waste discharge requirements.		
1515	385	2-32	#2.6.1.3, 1st para	SWRCB	"Water rights" is not hyphenated. D-1379 and D-1275 were water right decisions, not water control plans.		
1514	386	2-32	#2.6.1.2, 2nd para	SWRCB	The Enclosed Bays and Estuaries and Inland Surface Waters Plans (EBEP and ISWP) are not being considered for readoption. U.S. EPA is promulgating numeric objectives for metals and organic compounds through the California Toxics Rule. The SWRCB is developing an implementation policy to support this rule..		
1003	387	2-32-33 2-38-39	2.6.1.3 2.6.4.4	TH, EPA	Too detailed. Could delete text following sentence ending, "...permits for operating the CVP and SWP." Move material in this paragraph into section 2.6.1.3		
149	*388*	*2-33*	*Section 2.6.1.4*	*Spaar, DWR*	*4th and 5th bullets (lines 1-2) in the 2nd column are repetitious and should be combined.*	C	
117	389	2-33	2nd column	Sandino, DWR	February export limits actually range between 35%-45% depending on Delta inflow.	T	
1004	390	2-33	2.6.1.4	TH, EPA	delete fourth bullet		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1519	391	2-33	#2.6.1.4, 1st sentence	SWRCB	This sentence could be misleading. The draft objectives were part of the 1994 draft Bay-Delta Plan. The 1994 draft Bay-Delta Plan was released on the same day as the Bay-Delta Accord, but was not released with the Accord. The Bay-Delta Plan is a separate document.		
1517	392	2-33	#2.6.1.3, 2d full sentence	SWRCB	The legal challenges against D-1485 and the 1978 Delta Plan were brought in 1978, not in the 1980's.		
1520	393	2-33	#2.6.1.4, 3rd dot	SWRCB	The SWRCB did not adopt new EC objectives for Vernalis in the 1995 Bay-Delta Plan. These EC objectives were first adopted in the 1991 Bay-Delta Plan.		
1518	394	2-33	#2.6.1.3, 6th and 7th sentence	SWRCB	These sentences misstate the SWRCB's hearing process. An accurate sentence would read: "The SWRCB conducted a water right hearing to receive evidence and recommendations on measures to protect fish and wildlife. After the hearing, the SWRCB released a draft water right decision, draft D-1630, that included interim water right terms and conditions. Actions taken by the NMFS and USFWS to protect winter-run chinook salmon and Delta smelt resulted in the withdrawal of D-1630 after the hearing, without it being adopted. "		
32	395	2-34		CDFA	should be discussion on point source (check EPA language provided)		
1131	396	2-34	Section 2.6.1.6, Federal Guidance on WQ Criteria for Toxic Pollutants	GL, EPA	Suggested rewrite to follow fifth sentence ending "in the Inland Surface Water Rule." Delete rest of paragraph and insert the following text: "EPA proposed water quality criteria for priority toxic pollutants for California in the Federal Register on 8/5/97. This proposal, called the California Toxics Rule, addresses parameters that were not covered for California in the original National Toxics Rule. The proposed rule will, when finalized, establish ambient water quality criteria for priority toxic pollutants for California inland surface waters, enclosed bays, and estuaries.		
35	397	2-34	After sec. 2.6.1.6	Steve Shaffer, CDFA	insert a new section on CWA Sec. 319 NPS program compiance.		
1521	398	2-34	#2.6.1.6	SWRCB	This paragraph contains two references to an "Inland Surface Water Rule." The correct name is "Inland Surface Waters Plan".		
1522	399	2-34	#2.6.1.7	SWRCB	The information in this paragraph is out of date. The Suisun Marsh Preservation Agreement is being amended, and environmental documentation is being prepared for the amendment. The CVP and SWP will bring this agreement before the SWRCB for approval in the upcoming Bay-Delta Water Rights Hearing.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1523	400	2-34	#2.6.2	SWRCB	*The quote in the last line of the first para should read "first in time, first in right" (emphasis included only for clarity). *In the 2d para, the first sentence should say, at the end, "unless they are adjudicated." At the end of the second sentence of the 2d para, add "and on the smallest parcel adjacent to the water body." *In the 3d para, the second and third sentences should read: "Appropriative water rights obtained after 1914 require permits and licenses issued by the SWRCB. All appropriations existing before 1914 have seniority based on the date when they were initiated." *The last sentence in the 3d para is not fully accurate. The quantity and quality of water can be limited somewhat by subsequent appropriations, so long as the senior rights are not legally injured. Defining injury is complicated and depends on the facts.		
1130	401	2-34	2.6.1.6	TH, EPA	edit: "These criteria were used by the State in developing the 1991 Inland Surface Water Rule, which was subsequently invalidated by California courts."		
150	*402*	*2-34*	*2.6.1.7*	*K. Guivetchi, DWR*	*It should be added that the SWRCB 1995 WQCP includes the SMPA normal and deficiency period standards for the western Suisun Marsh, and recommends that the SMPA parties should "continue the actions, including facility plans, identified for implementation of the SMPA".*	T	
151	403	2-35		DWR O&M	Drinking water standards are for treated water only, not sources of water	T	
152	404	2-37	Section 2.6.3.6	R. Tom, DWR	On page 2-37 (second paragraph on the left hand side), it should be made clearer that the Stage One regulations of the Disinfectant/Disinfection By-Products Rule will require varying degrees of removal of total organic carbon from source waters prior to treatment with disinfectants. This removal requirement is significant in that the drinking water regulations will impose a water quality requirement on the source water (not on the finished drinking water). As such, total organic carbon will not be considered a drinking water contaminant in finished drinking water (with an established maximum contaminant level). This removal requirement will indirectly establish the need to lower or minimize total organic carbon concentrations in source waters.	T	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1173	405	2-37 to 2-38 (cont'd)	Section 2.6.4.1 (cont'd)	FWS	alternative are considered major Federal actions requiring compliance with section 7 of the ESA. ~~A broad analysis of the alternative selected during Phase II will be followed by project-specific analyses of individual Federal agency actions during Phase III. This approach will also ensure ESA compliance for Phase III individual actions that affect listed species if no Federal agency action is involved. Informal consultation between CALFED and USFWS and NMFS during Phase II focused on specific species and geographic regions. If it is determined that the selected or preferred alternative may affect a listed species, a biological assessment will be prepared by CALFED and submitted to USFWS and NMFS for review and concurrence. Following acceptance of the biological assessment, the USFWS and NMFS will prepare separate biological opinions.~~ The USFWS and NMFS will conduct a programmatic section 7 consultation on Phase II of the CALFED Program. Specific Federal projects or actions developed after Phase II will be addressed through amendments to the programmatic consultation or through subsequent, separate section 7 consultations. The impacts of incidental take resulting from non-Federal actions will be addressed through section 10 of the ESA and the development of one or more Habitat Conservation Plans. A section 7 consultation addressing the effects of SWP and CVP operations under the CALFED Program on listed species will replace the existing biological opinions discussed above.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1172	406	2-37 to 2-38 (cont'd)	Section 2.6.4.1 (cont'd)	FWS	Section 10 of the ESA allows for incidental take of endangered and threatened species by non-Federal entities. Section 10 requires that an applicant for an incidental take permit submit to the USFWS and/or NMFS a conservation plan (generally referred to as a "Habitat Conservation Plan" or "HCP") that specifies, among other things, the impacts that are likely to result from the taking and the measures the permit applicant will undertake to minimize and mitigate such impacts. The ESA has required assessment of water-project operations for effects on fish species listed as threatened or endangered. In February 1993, the NMFS issued its biological opinion, pursuant to section 7 of the ESA, on the effects of SWP and CVP operations on winter-run chinook salmon. In March 1995, the USFWS issued a biological opinion, pursuant to section 7 of the ESA, on the effects of SWP and CVP operations on delta smelt. The biological opinions establish requirements for SWP and CVP operations that impose important constraints on Delta water supply management to protect these listed species. These include requirements for Delta inflow, Delta outflow, Delta Cross Channel gate closure, QWEST flows (net Delta outflows), and reduced export pumping because of specified incidental "take" limits. ~~("Take," as defined in the ESA, includes harassment of and harm to a species, entrainment, directly and indirectly caused mortality, and actions that adversely modify habitat.)~~ The CALFED Phase II programmatic environmental review, reconnaissance-level analysis, and prefeasibility-level planning to prepare the Programmatic EIS/EIR and select a preferred		

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1171	407	2-37 to 2-38	Section 2.6.4.1	FWS	Suggest the following changes to this section: Section 9 of the ESA and Federal regulation prohibit "take" of federally listed species of wildlife unless such take is authorized under the provisions of section 7, section 10(a), or section 4(d) of the ESA. The ESA defines take as "to harass, harm, pursue, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." The term "harass" is defined by Federal regulation as "an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering." Harm is defined as "an act which actually kills or injures wildlife" and "may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering." Incidental take is any take that results from, but is not the purpose of, carrying out an otherwise lawful activity.		
	408	2-37 to 2-38	Section 2.6.4.1	FWS	Suggest the following changes: Section 7 of the ESA ~~of 1973, as amended,~~ requires Federal agencies, in consultation with the USFWS and the NMFS, to ensure that their actions do not jeopardize the continued existence of endangered or threatened species or result in the destruction or adverse modification of the critical habitat of these species. Section 7 also allows for an exemption of the section 9 take prohibitions, based on implementation of the terms and conditions specified in the biological opinion prepared by USFWS or NMFS pursuant to section 7.		
814	409	2-38	2.6.4.1, third sentence	Fujitani, USBOR	Suggest revise to..."These include requirements for Delta inflow, Delta outflow,...QWEST (~~net Delta outflows~~) (calculated net flow from the central Delta to the western Delta), and reduced pumping because..."		
1005	410	2-38	2.6.4.1	TH, EPA	The reference to compliance with ESA section 7 (first sentence, second para) is inappropriate at this time. Instead reference treatment of subject on page 11-2.		
815	411	2-38	2.6.4.3, first sentence	Fujitani, USBOR	Suggest revise to "The CVPIA dedicates 800,000 acre-feet of CVP yield per year (AF/year) of water for fish..."		
34	412	2-39	before existing2.6.6	CDFA	insert public policy statement language on ag land protection - Steve to provide		
41	413	2-39	left col right par		delete c-fog acronym, make it ops group		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
118	414	2-39	section 2.6.5.	K. Kelly, DWR	Yikes!!! These are the founding documents for CALFED. Please review them. The framework agreement specifies the three actions (WQCP, Ops Group, Long-term). There is no C-FOG. It is the CALFED Ops Group. Recommend the Section heading be changed from "SWP/CVP Operations" to something like "Federal and State Coordination for a Delta Solution" and the CALFED Ops Group be discussed under the framework agreement (no separate section). Also Category III actions should be mentioned. I scanned section 2.6.1.4-- replace "the 1995 WQCP objectives are expected to be fully implemented with a new water rights decision within the next three years" to "in 1998". I didn't review any other sections under 2.6. but it may need closer review by staff.	C	
525	415	2-39	Section 2.6.5.2	DFG	We suggest that the acronym C-FOG not be used and that the term "Ops Group" be used.		
119	416	2-39	section 2.7	K. Kelly, DWR	Change title from "Alternative not ..." to "Storage and Conveyance Configurations not.." The reader needs to know about this discussion earlier in the document. Recommend either moving it up in the chapter or referencing this section in the preceeding text where appropriate. A description of the refinement process needs to be included earlier in the document possibly accompanied with a figure.	P	
36	417	2-39	2.6	Steve Shaffer, CDFA	Institutional and regulatory framework - This section needs to include the Delta Protection Commission and public policy regarding the protection of agricultural resources.		
1006	418	2-39	2.6.5.1	TH, EPA	Move last long sentence (beginning "It addressed...") before "The Principles for Agreement..." The point is that the three areas of agreement are in the Framework Agreement, not the Accord.		
120	419	2-39	s2.6.5	Dan Flory, DWR	I didn't see any mention of the state/federal Coordinated Operation Agreement. I would think the agreement has a substantial impact on SWP/CVP operations even if it isn't working as smoothly as when it was signed.		
628	420	2-39	2.7	Rick B., CALFED	move to just before 2.4		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
691	421	2-4	Last paragraph	WAPA	The nonvariable components go directly to the Purpose and Need Statement, especially the primary purpose which is described on page 1-3 as "*to develop and implement a long-term comprehensive plan that will restore ecological health and improve water management...*" More analysis and thought should go to the range of possible approaches needed to analyze ecological health. Further environmental documentation will likely be needed and this documentation could impose restrictions on water and hydropower operations. The possible range of restrictions and management practices should be disclosed in this PEIR/EIS.		
81	422	2-4	Section 2.1.1.6	Finfrock, DWR	First paragraph is too long and too wordy; takes a lot of effort to follow the writer and get the point. Suggested change: "The preliminary alternatives focused on single problems rather than the primary objectives or all four conflicts. The next step was to look for the best ways to combine the preliminary alternatives into alternatives that met all the CALFED objectives."	C	
793	423	2-4	Col. 2, Paragraph 3	Choward, USBOR	Use the terminology of the "common program."		
611	424	2-4	2.1.1.6	Rick B., CALFED	Delete 1st 4 paragraphs of 2.1.1.6. Modify 1st line of next paragraph as follows, "The outcome of the Phase I process was..."		
121	425	2-41	1st column	Sandino, DWR	Reference to "sidebar" analysis on pipeline cost is ambiguous. "Sidebar" is not a CEQA/NEPA term and I would delete it. I would also clarify that the pipeline environmental impacts are very similar to those of a cannel, and therefore the elimination of the pipelines alternatives did not results in the loss of an environmentally preferable alternative from study.	P	
87	426	2-5		K. Kelly, DWR	I like the discussion on the alternatives (ie common programs and storage and conveyance configurations)	P	
82	427	2-5	Section 2.1.1.6, paragraph after Ecosystem Restoration	Finfrock, DWR	A very rapid jump to the conclusion that only water conveyance and storage varied between the alternatives. There has been so many pages of tedious explanations (of process) up to this point, and now that we are finally getting to the meat of the matter, there is no explanation of how this conclusion was reached! The reader can't reach the same conclusion because the alternatives aren't listed, and it is not clear from the accompanying text. And what is the "structure" that is mentioned repeatedly in this paragraph?	C	

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1160	428	2-5	section 2.2.1	FWS	The first two sentences of the No Action alternative section seem unrealistic. At the very least, it is impossible to make a realistic prediction of the "regulatory features" that are likely to be in place in 2020--which the PEIS tacitly acknowledges in the very next sentence. Since the beginning and end of this paragraph seem to cancel each other out, recommend deleting it entirely. The real purpose of the No Action alternative is addressed in the paragraph that follows it.		
794	429	2-5	Col. 1, Paragraph 8	Choward, USBOR	Suggest revise to read...the remaining 10 alternatives into three Phase II alternatives.		
612	430	2-5	2.1.1.6	Rick B., CALFED	1st full paragraph, left column. Add "components" to first sentence between "storage" and "varied". Delete next three sentences. Delete last sentence and the three bullet items. 2nd full paragraph, left column, Deleted "10" and change "II" to "I" in the first sentence. Add the following, " Figure 2.2.2.1(need to change number?) depicts this simplified structure." Move figure 2.2.2.1.		
613	431	2-5	2.1.2	Rick B., CALFED	1st paragraph - change "II" to "I" in second bullet. Insert "A detailed discussion of this Phase II effort can be found in the Phase II Report Technical Appendix." following the 3rd bullet. 2nd paragraph - 2nd line replace "contain" with "were expanded to include". 3rd paragraph - delete 2nd sentence. Change section # in next sentence to whatever the new one is.		
614	432	2-5	2.2	Rick B., CALFED	delete 2nd sentence		
31	433	2-5	2.2.1	DFG	explain that current assumptions may be different for some specific actions (B2) - acknowledge why evaluation was made in way it was.		
992	434	2-5ff	2.2.1	CY, EPA	Need to summarize key features of no action more clearly (in part, could accomplish this by sorting out Table 2.2.1.1 by categories-- e.g., delta operations/wqs, CVP system, SWP system). Also (possibly here) need to explain "existing conditions"-- particularly parameters used to model "existing conditions."		
88	435	2-6		K. Kelly, DWR	Include a definition of Affected Environment in the bibliography. second sentence under 2.2.2. Each alternative includes programs for ...	P	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
85	436	2-6	Section 2.2.2	Finfrock, DWR	Change second & third sentences to: "Each alternative includes *a similar basic program for* water use efficiency.... Further, each alternative includes *different* water..."	C	
692	437	2-6	Section 2.2.3	WAPA	This section needs to be reorganized in order to understand subsections 2.2.3.1 through 2.2.3.7. Use consistent terminology throughout the document. Suggest that the terminology used in Section 2.2.3 also be used in the Introduction, i.e., identify the subsections as actions, common programs, and features. *Actions* are Watershed Management and Water Transfer Coordination (which are implemented in all alternatives). *Common programs* are Ecosystem Restoration Program, Water Quality Program, Water Use Efficiency Program, Levee System Integrity Program. *Features* are Water Storage and Water Conveyance. ("Features" could also be referred to as "facilities.")		
615	438	2-6	2.2.2	Rick B., CALFED	delete this section		
83	439	2-6	2.2.3	K. Nelson, DWR	Perhaps I missed it, but how did the "water transfer" and "watershed management coordination" elements become part of each alternative in the same way as a core program element?	C	
616	440	2-6	2.2.3	Rick B., CALFED	adjust section # . 2nd paragraph - delete last sentence and insert, "There is a watershed management technical appendix. The Program is not proposing a water transfer program rather the Program recognizes that transfers are a part of the overall water managment landscape in California and proposes to work cooperatively to facilitate a statewide water transfer market."		
618	441	2-6 to 2-10	2.2.3.1 to 2.2.3.4 fig 2.2.2-1	Rick B., CALFED	add info from attached disc following organization and content of EIS/EIR. move figure to 2.1.1.6		
795	442	2-6	2.2.3.1	Fujitani, USBOR	Suggest additional detail on the Ecosystem Restoration Program description. Including proposed actions in the ERP such as additional in stream river flows would be helpful.		
28	443	2-6	2.2.3.1	CDFA	more complete description of ERP, specifically list stressors as described in ERP appendix - include the disagreements that exist among experts		
31	444	2-6	2.2.3.1	Steve Shaffer, CDFA	Other stressors should be listed - introduced species, toxicity, etc.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
84	445	2-6	3rd paragraph ("Since water simulation...	Finfrock, DWR	The meaning of this sentence isn't clear.	C	
513	446	2-7		DFG	A separate table should be provided which displays the features of the assumed conditions for Existing Conditions.		
29	447	2-7		DFG	could another table or additional column be added that describes the existing conditions? Either here or in chapter 5		
27	448	2-7	table	USFWS	no action assumptions - evaluate those made and determine if need to be altered or discussed more fully		
617	449	2-7	table 2.2.1.1	Rick B., CALFED	add following to the end of the title "Based on Their Status as of June 1995."		
92	450	2-7	Table 2.2.1-1	K. Nelson, DWR	There are many more objectives in the CVPIA EIS than are mentioned in this table under "CVPIA". How were the four listed elements selected? Delivery of Level IV water to refuges is not in every alternative being evaluated by the CVPIA EIS.	T	
94	451	2-7	Table 2.2.1-1	Stuart, DWR	Without backup this table leaves more questions than answers. (i.e. What does the item mean, "Sacramento, American, Feather, Stanislaus, Merced, Mokelumne, etc."? Also, what is included in "Flood Control Policies"? "Trinity River"??--releases downstream or diversions to Keswick?)	C	
514	452	2-7	Table 2.2.1-1	DFG	With regards to features 2 and 10, what is the significance of the recently proposed approach for B-2 water and the potential listing of the spring-run chinook salmon with regards to the assumptions under the No-Action Alternative? A sentence or two should be added to the text explaining the significance of these actions to this EIS/EIR.		
796	453	2-7	Table 2.2.1-1 items 2 & 6	Fujitani, USBOR	This table notes that the No Action Alternative assumes CVPIA and dedication of the 800,000 TAF, and also operations pursuant to the 1992 CVP OCAP. Actions contained in the CVPIA may not conform with the operations presented in OCAP, especially in the operation of Shasta Reservoir for temperature control and the temperature compliance point. OCAP and CVPIA have different Keswick minimum release goals which affect the capability to meet the temperature criteria for the winter-run salmon. It could be said the studies contain the portions of the operations pursuant to both the CVPIA and OCAP.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
694	454	2-7	Table 2.2.1-1, Row 21	WAPA	45,000 acres retired by 2020: The table should indicate where these lost acres would occur. The CVPIA PEIS indicates in it's No Action Alternative that 45,000 acres are retired throughout the CVP and that 742,000 acres are converted to M&I area. Are these converted lands also accounted for in the CALFED PEIR/EIS? Page 8-106 (first full paragraph, second column) indicates that the CVPIA PEIS Alternative 1 was used as the no action condition for the CALFED PEIR/EIS for M&I analysis. Was the CVPIA PEIS used to establish assumptions for other analyses? Was the 742,000 acres accounted for in such a way as to be consistent with the CVPIA PEIS? Alternative 1 of the CVPIA PEIS also includes assumptions for the conversion or retirement of up to about 180,000 acres; are these lands accounted for in the CALFED PEIR/EIS?		
693	455	2-7	Table 2.2.1-1, Row 2	WAPA	How is the CVPIA b(2) water (800,000 AF) defined? Is this described somewhere in the document? Is it consistent with the CVPIA PEIS and/or the Garamendi Stakeholder Process definitions?		
1164	456	2-7 (see also p. 6-56)	Table 2.2.1-1 (see also section 6.1.4.3)	FWS	assessments prepared by USBR and DWR described project operations, and analyzed potential effects, in terms of historic operations. We believe the NMFS biological opinion on the effects of project operations on winter-run chinook salmon used a similar analysis. As a result, project operations that result in increased exports beyond historic levels would have effects on listed species that were not considered in the earlier consultations (and that the PEIS itself recognizes could be significant), which would require reinitiation of the section 7 consultations. We recommend that CALFED use the same approach that USBR used in the draft PEIS for CVPIA: keep export levels constant between Existing Conditions and No Action, and limit them to the maximum seen in the 1980 to 1993 period (CALFED could go through 1995). We recognize that this change would have cascading effects on the analysis throughout the PEIS, but we believe it is necessary. Also, we believe the appropriate changes could be made relatively easily, as the necessary analysis is at least briefly explained in the comparisons of No Action to Existing Conditions. The effect of the change we recommend would be to move this (and generally expand it) to the comparison of the Alternatives to No Action.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1163	457	2-7 (see also p. 6-56)	Table 2.2.1-1 (see also section 6.1.4.3)	FWS	The Table indicates that the No Action alternative includes CVP delta exports of 3.5 maf, and SWP delta exports of 3.6 - 4.1 maf. Combined, this represents a significant increase over existing conditions. This issue is also discussed in section 6.1.4.3 (p. 6-56), which notes that demand in No Action will increase, while there will be no significant changes to delta inflows compared to Existing Conditions; as a result, No Action will either show significant demand deficits or significant reductions in Delta outflow. The Table, and the analysis elsewhere throughout the PEIS, indicates that CALFED has chosen the latter assumption. We believe this decision is both unfortunate and inappopriate. It is unfortunate in that it tends to render the alternatives analysis far less useful, in that many of the possible impacts of the CALFED alternatives associated with increased water supply are essentially "hidden" by being included in the No Action assumptions. Indeed, this assumption calls into question one of the main "needs" for the CALFED program itself: if water users really are assured of such a significant increase in supply under No Action, what role does CALFED really play? More importantly, this decision is inappropriate in that it is inconsistent with the No Action screening criteria. While these criteria were apparently applied only to "projects", they should also generally apply to operations. In this case, there is no existing ESA compliance for the project operations necessary for this level of delta exports. The analysis in our biological opinions on the effects of project operations on delta smelt (and bald eagles, for that matter) was not based on "worst case" operations under the existing standards; instead, it was based on the historical operations of the projects (modified only by the additional environmental protections measures proposed by DWR and USBR). Similarly, the biological		
93	458	2-7	T-2.2.1-1	P.Wendt DPLA (DWR)	"Land Retirement" in No Project Alternative. It is not clear what assumptions were made about land retirement here. The DWR no longer has an active program, and the USBR program is just beginning. More importantly, most of the 75,000 acres of problem lands identified in the Drainage Report do not drain to the SJR. The purpose of the program was reduce selenium conc. in subsurface drainage to protect ground water. It is highly unlikely that the USBR's land retirement program, which is primarily focused in Westlands WD, will have any effect on SJR water quality. It may have only limited affect on demand management as some of the acreage acquired will be land that has already been fallow for some time. This assumption needs to be looked at in some detail as it relates to base line WQ conditions, and demand management..	T	

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
89	459	2-8		K. Kelly, DWR	Is it possible to change the "Existing through Delta facilities" name to "Upgraded Existing Delta facilities" or "Modified Existing Delta facilities" at this stage of the program? The second alternative would then need to be changed from "Modified Through-Delta" to "Through-Delta".	T	
90	460	2-8		K. Kelly, DWR	page 2-8 through 2-11 The description of the common programs and watershed management is weak. I know this isn't a very helpful comment. I recommend referencing the appropriate technical appendix for each program in the text.	P	
35	461	2-8		DFG	consider graphics that show alternatives on maps; map of delta region		
799	462	2-8	Fig 2.2.2-1	Slavin, USBOR	The potential variability of water use efficiency is not represented in this chart. Water transfers, water costs, land fallowing, and other factors which would vary depending upon which alternative is selected.		
95	463	2-8	Figure 2.2.2-1	Finfrock, DWR	The storage section should have units on the horizontal grid, even if numbers are relative rather than absolute. Are they increases from existing or from zero storage?	C	
1528	464	2-8	Table 2.2.1-1	USDA-FS	No Action alternative does not include description of reasonably foreseeable actions. There are several foothills water agencies that have proposed either reoperation or construction of facilities that could impactwater supply to the delta. Several Federal NEPA documents (eg., Tahoe NF Westside Wild and Scenic River DEIS) acknowledge these projects. For example, Placer County Water Agency is studying the feasibility of raising the dam at Hell Hole Reservoir on the Rubicon. Yuba County Water Agency is proposing two new facilities, Waldo Dam and Parks Bar Dam. While these are only proposals, they are potential impacts and should be acknowledged. It may be possible to include this information in the cumulative effects chapter. Similarly Table 2.2.1-1 acknowledges the California Water Plan but does not discuss any of the projects. The Plan just released suggests that the Waldo and Parks Bar facilities are likely to be built. Also the Table mentions FERC reliscensing of the Yuba and Tuolumne but does not discuss the changes in water supply that may result. The majority of Sierran dams will or are being reliscensed by 2020 and the PEIS could relate known impacts from past reliscensing and project juture impacts		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1165	465	2-8	fig. 2.2.2-1	FWS	This Figure would be more helpful if it showed the No-Action alternative as well as the program alternatives. The part of the Figure related to storage is confusing: it suggests that storage levels are the same for each version of each of the major alternatives (although it is meant to cover the range addressed in each of the major alternatives). Rather than solid bars, this range might be better depicted with lines with arrows at both ends.		
798	466	2-8	Fig. 2.2.2-1	Gore, USBOR	This figure limits storage features to off stream storage. This gives the impression that all CALFED storage evaluations to date have limited alternatives to off stream storage.		
797	467	2-8	Fig. 2.2.2-1	Choward, USBOR	Not consistent with paragraphs. Under UP, should include on stream storage also, such as enlarged Shasta. Suggest Column headings, Alternative 1, Alternative 2, Alternative 3.		
96	468	2-8, 2-9, 2-10		Finfrock, DWR	In Fig. 2.2.2-1 and Section 2.2.3.3, what was formerly the CALFED component "water supply reliability", is now "water use efficiency". The other 3 components haven't changed; consistency of all 4 components would be good. Then Water Transfers are discussed as part of water supply reliability. Confusing.	C	
97	469	2-9		P. Wendt, DPLA (DWR)	Bullets after "Parameters of Concern" - because this is essentially a list, and an incomplete list as compared to Table 6.1.1-2, reference should be made here to Table 6.1.1-2 for the complete listing of these parameters.	C	
99	470	2-9		DWR O&M	Is there a priority of water quality parameters of concern ie are ecosystem parameters of highest priority	T	
26	471	2-9		USFWS	under water use efficiency program, suggest delete first two paragraphs		
30	472	2-9			need to add statement that if you want anything from CALFED you need to implement features of water use efficiency program		
1121	473	2-9	Bullets under WQ	GL, EPA	The first bullet, which depicts water quality parameters of concern, should specifically identify "selenium" as a metal or trace element (in addition to Cd, Cu, Hg and Zn listed). Total organic carbons (TOC) should be added - perhaps under 3rd bullet "minerals and nutrient" or as a separate bullet.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
800	474	2-9	General comments	Slavin, USBOR	It would be helpful to have more information describing the WUE program in the program description. It is very difficult to assess the impacts of the WUE program in the rest of the report without a little clearer understanding of the program. It is not clear whether Water Transfers is linked to the WUE program or separate. For instance, in Table 3.1-1, page 3, under Fisheries and Aquatic Ecosystem, Transfers is incorporated into WUE section while in the overview it is treated separately. If it is a part of WUE component it would be difficult to say that WUE component would not vary over the 3 alternatives (see 2-8 above) In addition to the list of acronyms, an expanded list including definitions of terms and conversion tables would be helpful, either in the EIS or the accompanying phase II report.		
91	475	2-9	section 2.2.3.3.	K. Kelly, DWR	Shouldn't the linkage between receiving additional supplies and using water efficiently be discussed here?	P	
153	476	2-9	Section 2.2.3.2	Ray Tom, DWR (DPLA)	The list of parameters of concern under the subsection entitled **Water Quality Parameters of Concern** should include total and/or dissolved organic carbon.	T	
801	477	2-9	2.2.3.2, last paragraph	Fujitani, USBOR	The paragraph precluding the list of water quality parameters of concern should clearly state that these are examples not limited to what is listed.		
993	478	2-9	2.2.3.2	TH, EPA	edit: "It should be noted that the Water Quality.... enforcement of existing regulatory programs and provision of incentives for action that goes beyond current regulatory programs. The actions do not involve new regulatory programs."	**	
20	479	2-9	2.2.3.2	EPA	'regulations' change to 'regulatory programs' in section		
994	480	2-9	2.2.3.3	NY,CY, EPA	Delete the last paragraph as written, as it does not represent WUE program approach fully. Rewrite along these lines: "While most actions would be implemented by local water agencies, the CALFED Program would provide support through technical, planning, and funding assistance." When implementation plan is developed, more technical issues will come into play.	**	
21	481	2-9	3rd para2.2.3.3	EPA	delete para on water use efficiency . Increase info on common programs here or do it later and provide reference to info elsewhere in doc		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1166	482	2-9 - 10	sec. 2.2.3.3	FWS	Starting this discussion by saying the CALFED WUE program "reflects California's well-accepted policy ..." probably suggests to many readers "Don't expect anything new here." The continued praise of ongoing efforts to implement water use efficiency measures only reinforces this. And no one has any doubt after reading the conclusion that "the greatest challenge in water use efficiency is finding ways to encourage more users to implement [existing] measures." Isn't the "greatest challenge" really to identify new, more effective water use efficiency measures? Or to find ways to make some currently too-expensive measures cost-effective in the future? Does CALFED really want to say that all we need to do--all we can do--is get a few more people doing those few things a few others are already doing? Ideally this section would be re-written. CALFED should be approaching water use efficiency--like so much of the rest of the program--with the mindset of adaptive management. For example, we probably know as much about ecosystem restoration as we think we do about water use efficiency, but we do recognize that there's a lot more we'd like to know. A minimum revision would delete the first two paragraphs of the section, then go on to include more description of the policies by which CALFED proposes to encourage or provide incentives for efficiency improvements. Provide a summary here of projected and target quantities of water to be saved in the agricultural and urban sectors, based on detailed analysis in an appendix.		
98	483	2-9&10	all	EC, DWR	None of the information from the water use efficiency technical appendix is brought forward here. There is little information to give the reader a sense of what the Water Use Efficiency Common Program is.	C	
995	1590	chapter 2		ALL, EPA	There needs to be more information on the types of actions and anticipated benefits of the common programs. This may be provided in detail in Phase II document and summarized here; or include detail in PEIS. Reference the Common Program documents (Tas) consistently. NOTE: Impact analyses should identify, where possible, the type of common program action to which an appreciable impact is attributed. (Could be done in tabular form.)	**	

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
991	1593	Chapter 2		CY, EPA	For "Program Description" focus on the outcomes/results of the process (Program solutions addressing problems identified earlier, Chapter 1) rather than describe steps taken in getting to the results. Details on the process can be placed in a TA. The EIS needs a clear exposition of the "theories" behind the major alternatives 1-3 (how they "work," why they may help solve problems). *To some extent this may appear in Phase II, but it should also be discussed in the EIS, as it helps orient reader to benefits and impacts.*		
1069	1632	P. 2-27 or 2-31	Section 2.4 or 2.6	SZ, EPA	In Section 2, either under ***2.4 Relationship with other Ongoing Programs*** (page2-27) or ***2.6 Institutional and Regulatory Framework*** (page 2-31), should include a description of the State's Nonpoint Source Program. Therefore please insert the following language into either Section 2.4 or 2.6: **California Nonpoint Source Program (CWA §319/CZARA §6217)** Nonpoint sources of pollution are a major cause of water quality impairments in California and the throughout the San Francisco Bay/Sacramento-San Joaquin Delta estuary. As defined by §502(14) of the Clean Water Act, nonpoint source is any source of water pollution that does not meet the legal definition of "point source" in the CWA. Therefore, nonpoint pollution is the pollution caused by rainfall and snowmelt moving over and through the ground, finally depositing natural and manmade pollutants into lakes, rivers, wetlands, coastal waters and ground waters. In addition, atmospheric deposition and hydrologic modification are also sources of nonpoint pollution.		
					Two primary federal statutes, CWA §319 and CZARA §6217, along with the Porter-Cologne Act, establish a framework for addressing NPS pollution in California. As enacted by Congress in 1987, CWA Section 319 required California to develop an assessment report detailing the extent of nonpoint pollution and a management program specifying nonpoint source controls, in order to receive federal funding to implement nonpoint source controls. In 1990, Congress passed Section 6217(c)(1) of the Coastal Zone Act Reauthorization Amendments (CZARA) that requires the State to "develop and implement management measures for nonpoint source pollution to restore and protect coastal waters..." which is to serve as an update and expansion of the existing NPS program		

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
					California's nonpoint source management program has been developed over the last decade and continues to be refined. The California Nonpoint Source Management Plan, adopted by the State Water Resources Control Board in 1988, outlines a systematic approach to management of nonpoint source pollution in the State. The plan identifies three general management approaches to be used by the State Board and the Regional Boards to address nonpoint source problems. The three approaches that still form the basis for California's program are: (1) voluntary implementation of BMPs, (2) regulatory-based encouragement of BMPs, and (3) effluent limitations. BMPs are commonly defined as methods, measures or practices selected by an agency to meet its nonpoint source control needs. BMPs include but are not limited to structural and nonstructural controls and operation and maintenance procedures.		
					In February 1994, the State initiated a comprehensive process to consider the requirements of CZARA and update the existing statewide Nonpoint Source Program rather than create a separate program dealing exclusively with coastal waters. The state's updated program, as described by the Coastal Nonpoint Pollution Control Submittal (September 1995) and Initiatives in Nonpoint Source Management (September 21, 1995) calls for managing nonpoint sources on a watershed basis and focuses on nonpoint source problems associated with pesticides, grazing, urban runoff, hydromodification and abandoned mines. It also acknowledges that because of the dispersed nature and number of nonpoint source generating activities, the large number of private and public entities responsible for these activities, and the important role of local governments, "the California program can be characterized as one of building partnerships among all interested parties."		
					As of February 1998, California is still working to improve the nonpoint source program and to receive full program approval from U.S. EPA in compliance with CZARA.		

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1070	1633	P. 2-27 or 2-31	Section 2.4 or 2.6	SZ, EPA	management program specifying nonpoint source controls, in order to receive federal funding to implement nonpoint source controls. In 1990, Congress passed Section 6217(c)(1) of the Coastal Zone Act Reauthorization Amendments (CZARA) that requires the State to "develop and implement management measures for nonpoint source pollution to restore and protect coastal waters..." which is to serve as an update and expansion of the existing NPS program. California's nonpoint source management program has been developed over the last decade and continues to be refined. The California Nonpoint Source Management Plan, adopted by the State Water Resources Control Board in 1988, outlines a systematic approach to management of nonpoint source pollution in the State. The plan identifies three general management approaches to be used by the State Board and the Regional Boards to address nonpoint source problems. The three approaches that form the basis for California's program are: (1) voluntary implementation of Best Management Practices (BMPs), (2) regulatory-based encouragement of BMPs, and (3) effluent limitations. BMPs are commonly defined as methods, measures or practices selected by an agency to meet its nonpoint source control needs. BMPs include but are not limited to structural and nonstructural controls and operation and maintenance procedures.		
					source problems associated with pesticides, grazing, urban runoff, hydromodification and abandoned mines. It also acknowledges that because of the dispersed nature and number of nonpoint source generating activities, the large number of private and public entities responsible for these activities, and the important role of local governments, "the California program can be characterized as one of building partnerships among all interested parties." As of February 1998, California is still working to improve the nonpoint source program and to receive full program approval from U.S. EPA in compliance with CZARA.		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
1071	1634	P. 2-27 or 2-31	Section 2.4 or 2.6	SZ, EPA	In February 1994, the State initiated a comprehensive process to consider the requirements of CZARA and update the existing statewide Nonpoint Source Program rather than create a separate program dealing exclusively with coastal waters. The state's updated program, as described by the Coastal Nonpoint Pollution Control Submittal (September 1995) and Initiatives in Nonpoint Source Management (September 21, 1995) calls for managing nonpoint sources on a watershed basis and focuses on nonpoint source problems associated with pesticides, grazing, urban runoff, hydromodification and abandoned mines. It also acknowledges that because of the dispersed nature and number of nonpoint source generating activities, the large number of private and public entities responsible for these activities, and the important role of local governments, "the California program can be characterized as one of building partnerships among all interested parties." As of February 1998, California is still working to improve the nonpoint source program and to receive full program approval from U.S. EPA in compliance with CZARA.		
1392	1635	P2-13 to 2-23	Alternatives Description	P. Wisheropp: Woodward-Clyde	CEQA requires the need or justification for an action. Yet the alternatives are described with many features without an explanation of why the feature is needed. The ERP features are a good example of a feature that lacks the justification.		
7	1642	Page 2-1,	section 2-1	Robin Reynolds, CDFA	The "alternatives" in the ADEIR do not meet the requirements of CEQA for a range of reasonable alternatives: "The range of reasonable alternatives to the proposed project shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effects." (State CEQA Guidelines, Section 15126 (d)(2). The CDFA and others have identified very major adverse impacts for all the alternatives, especially the "common programs." There must be a range of reasonable alternatives which avoid or lessen these impacts, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (State CEQA Guidelines, Section 15126 (d)(1).		

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
8	1643	Page 2-4		Robin Reynolds, CDFA	"A major outcome of the scoping process was the conclusion that four components should be included in each alternative without variation." Approval of discretionary actions with a potential to impact the existing environment, in the face of significant controversy clearly identified by participants in the process is an improper, though certainly innovative and unique use of the CEQA scoping process. These decisions must be subjected to CEQA review in the public forum of the EIR. The CDFA requests, pursuant to Public Resources Code Section 21167, subdivision (f) for a copy of any and all notices of CEQA determinations regarding approval of any of the "Common Programs" or other elements of the CALFED program, including but not limited to "Category III" projects or programs.		
1123	1647	pp. 2-19 through 2-23	Section 2.2.4.3	GL, EPA	Under "Summarized Alternative Descriptions" - the EIS/EIR was going to include a sidebar analysis of a pipeline versus open channel isolated facility. Where is this analysis?	**	
1114	1668	up front (ch 2)	water transfers	NY, EPA	Policy group will need to spend a good chunk of time developing a process by which agencies can work together to develop a uniform set of rules. Agency heads need to specify what the final form will be (policy, regs, etc.) specify which staff are responsible, and timeframe. Otherwise this will not get done.		